

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RYAN DEAN,

Plaintiff,

v.

J. BISSELL, *et al.*,

Defendants.

Civil Action No.: 2:21-cv-09770-MCA-ESK

**DEFENDANTS JANET FUHRER AND
QUEEN'S UNIVERSITY'S MOTION TO
DISMISS**

Return Date: November 1, 2021

TO: Ryan Dean
3540 W. Sahara Avenue, 752
Las Vegas, Nevada 89102
Pro Se Plaintiff

PLEASE TAKE NOTICE that on November 1, 2021, at 9:00 a.m., or on such date as may be directed by the Court, Defendants, Janet Fuhrer and Queen's University (collectively "Queen's University Defendants"), by and through their attorneys, Finazzo Cossolini O'Leary Meola & Hager, LLC, shall move before the United States District Court for the District of New Jersey, Newark Vicinage, for an Order dismissing the claims asserted by Plaintiff against the Queen's University Defendants in their entirety, pursuant to Fed. R. Civ. P. 12(b)(1), 12(b)(2), and 12(b)(6).

PLEASE TAKE FURTHER NOTICE that in support of said Motion, the Queen's University Defendants rely upon the Memorandum of Law, Certification of Rachel R. Hager, Esq., Declaration of Janet Fuhrer, and Declaration of Lisa Newton, appended thereto.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is respectfully requested.

Dated: September 27, 2021

**FINAZZO COSSOLINI O'LEARY
MEOLA & HAGER, LLC**

By: /s/ Rachel R. Hager

RACHEL R. HAGER, ESQ.

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Attorneys for Defendants,

Janet Fuhrer and Queen's University

CERTIFICATION OF SERVICE

I hereby certify that on September 27, 2021, I caused Defendants, Janet Fuhrer and Queen's University's Notice of Motion to Dismiss, Memorandum of Law, Certification of Rachel R. Hager, Esq., Declaration of Janet Fuhrer, Declaration of Lisa Newton, proposed form of Order, and this Certification of Service to be electronically filed with the Clerk of the Court, United States District Court for the District of New Jersey, and that a copy was served electronically via ECF on all counsel of record.

/s/ Rachel R. Hager
RACHEL R. HAGER, ESQ.